

Megan E. Glor, OSB No. 930178
Email: megan@meganglor.com
John C. Shaw, OSB No. 065086
Email: john@meganglor.com
Megan E. Glor, Attorneys at Law, PC
707 NE Knott Street, Suite 101
Portland, OR 97212
Telephone: (503) 223-7400
Facsimile: (503) 751-2071

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KATHERINE NIEDERMEYER,

Plaintiff,

v.

**LINCOLN LIFE ASSURANCE
COMPANY OF BOSTON,**

Defendant.

Case No. 3:21-cv-00904-HZ

**JOINT STIPULATED MOTION
FOR EXTENSION OF CASE
DEADLINES**

Expedited review requested

CERTIFICATION PER L.R. 7.1

The undersigned have conferred and are in agreement regarding this motion.

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**JOINT STIPULATED MOTION
TO EXTEND CASE DEADLINES - Page 1 of 2**

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MOTION

The parties hereby move for an order extending the current case deadlines in this ERISA-governed benefit case (29 U.S.C. 1132(a)(1)(b)), by 30 days, as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Discovery cutoff	02/21/22	03/23/22
Plaintiff's Dispositive Motion	03/14/22	04/13/22
Defendant's Cross-Dispositive Motion and Response to Plaintiff's Motion	04/04/22	05/04/22
Plaintiff's Response and Reply	04/25/22	05/25/22
Defendant's Reply	05/16/22	06/15/22

The parties are engaged productively in settlement negotiations. Settlement involves significant taxation issues and Plaintiff requires additional time to address those issues. This motion is intended to allow sufficient time for the parties to complete negotiations and to prepare and file their dispositive motions if negotiations do not result in a settlement.

For the reasons set forth above, the parties respectfully request that the Court grant this motion, extending the case deadlines as stated above.

DATED: February 16, 2022.

Respectfully Submitted,

s/ Megan E. Glor

Megan E. Glor, OSB No. 930178

Email: megan@meganglor.com

Telephone: (503) 223-7400

Facsimile: (503) 751-2071

Attorneys for Plaintiff

s/ Iwana Rademaekers

Iwana Rademaekers, *Pro Hace Vice*

Email: iwana@rademaekerslaw.com

Telephone: (214) 579-9319

Facsimile: (469) 444-6456

Attorneys for Defendant

**JOINT STIPULATED MOTION
TO EXTEND CASE DEADLINES - Page 2 of 2**

Megan E. Glor, Attorneys at Law
707 NE Knott Street, Suite 101
Portland, OR 97212
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